

Hearing Date: December 16, 2008  
Time: 10:00 a.m.  
Objection Deadline: December 15, 2008  
Time: 12:00 p.m.

KLESTADT & WINTERS, LLP  
Tracy L. Klestadt  
John E. Jureller, Jr.  
292 Madison Avenue, 17<sup>th</sup> Floor  
New York, NY 10017  
Tel: (212) 972-3000  
Fax: (212) 972-2245

*Attorneys for OMX Timber Finance Investments II, LLC*

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----X	
	:
<b>In re:</b>	:
	:
<b>LEHMAN BROTHERS HOLDINGS, INC., et al.,</b>	:
	:
<b>Debtors.</b>	:
-----:	
	:

**NOTICE OF HEARING ON MOTION OF  
OMX TIMBER FINANCE INVESTMENTS II, LLC FOR  
LIMITED RELIEF FROM THE AUTOMATIC STAY**

**PLEASE TAKE NOTICE**, that upon the motion (“Motion”) of OMX Timber Finance Investments II, L.L.C. (“*OMX Timber II*”), by and through its counsel, the undersigned will move this Court before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, 1 Bowling Green, New York, New York on December 16, 2008, at 10:00 a.m., or as soon thereafter as counsel may be heard (“Hearing Date”), for entry of an order granting relief from the automatic stay imposed pursuant to section 362(d) of title 11 of the United States Code (the “*Bankruptcy Code*”) for the limited purpose of reserving its rights under that certain Guaranty issued by Lehman Brothers

Holdings, Inc.

**PLEASE TAKE FURTHER NOTICE** that objections to the relief requested in the Motion, if any, must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court and shall be filed with the Bankruptcy Court electronically by registered users of the Bankruptcy Court's case filing system (the User's Manual for the Electronic Case Filing System can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official website for the Bankruptcy Court) and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Word, Wordperfect or any other Windows-based word processing format (with a hard-copy delivered directly to Chambers of Hon. James M. Peck) and shall be served upon (i) Klestadt & Winters, LLP, 292 Madison Avenue, 17<sup>th</sup> Floor, New York, New York 10017-6314, Attn: John E. Jureller, Jr., attorneys for Movant, *OMX Timber Finance Investments II, LLC*, (ii) Weill Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153 (Attn: Richard P. Krasnow, Esq., Lori R. Fife, Esq., Shai Y. Waisman, Esq. and Jacqueline Marcus, Esq.), attorneys for Debtors; (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21<sup>st</sup> Floor, New York, NY 10004 (Attn: Andy Velez-Rivera, Esq., Paul Schwartzberg, Esq., Brian Masumoto, Esq., Linda Rifkin, Esq, and Tracy Hope Davis, Esq.); (iv) Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, NY 10005 (Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq.), attorneys for the Official Committee of Unsecured Creditors; (v) Cleary Gottlieb LLP, One Liberty Plaza, New York, NY 10006 (Attn: Lindsee P. Granfield, Esq. and Lisa Schweiger, Esq.), and Sullivan & Cromwell LLP, 125 Broad Street, New York, NY 10004 (Attn: Robinson B. Lacy, Esq. and Hydee R. Feldstein, Esq.), attorneys for Debtors' postpetition lenders, so as to be received not later than 12:00 p.m. on December 15, 2008.

Dated: New York, New York  
December 2, 2008

KLESTADT & WINTERS, LLP  
Attorneys for Movants  
*OMX Timber Finance Investments II, LLC*

By: /s/John E. Jureller, Jr.  
Tracy L. Klestadt  
John E. Jureller, Jr.  
292 Madison Avenue, 17<sup>th</sup> Floor  
New York, NY 10017  
(212) 972-3000